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## **DOCKET NO. 49673**

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COMPLAINT OF ASPIRE COMMODITIES, LLC AGAINST THE ELECTRIC RELIABILITY COUNCIL OF TEXAS

## ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.'S MOTION FOR LEAVE TO FILE A REPLY TO THE RESPONSE OF ASPIRE COMMODITIES LLC TO ERCOT'S MOTION TO DISMISS

COMES NOW, Electric Reliability Council of Texas, Inc. (ERCOT) and files this Motion for Leave to file a Reply to the Response of Aspire Commodities, LLC (Aspire) to ERCOT's Motion to Dismiss, as permitted by 16 Tex. Admin. Code § 22.181(e)(4) (TAC). In support of its Motion, ERCOT respectfully shows the following:

ERCOT requests leave to file a reply to Aspire's Response for two reasons. First, granting ERCOT leave to file a reply will allow ERCOT to clarify the legal name of the "Aspire" Market Participant registered with ERCOT, as discussed on page six of ERCOT's Motion to Dismiss. Second, permitting ERCOT leave to file a reply will allow ERCOT to respond to the assertions made by Aspire in its Response that relate to whether Aspire has alleged a sufficient injury to qualify as an "affected entity" entitled to seek relief from the Commission under 16 TAC § 22.251. No party in this matter should suffer prejudice or undue delay due to the filing of ERCOT's reply.

Therefore, for the foregoing reasons, ERCOT respectfully requests that leave be granted for the filing of ERCOT's Reply to Aspire's Response, which is being filed contemporaneously with this Motion.



Respectfully submitted,

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ATTORNEYS FOR ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record to this proceeding on August 9, 2019, by hand delivery, fax, or first-class U.S. mail.